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Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SAHAR SAFAKISH,
*individually and on behalf of all those
similarly situated,*

Plaintiff,

vs.

TX TIN LLC D/B/A STOCK NEWS,

Defendant.

Case No.: 5:25-cv-03644-NW

Hon. Susan van Keulen

**NOTICE OF VOLUNTARY DISMISSAL
WITHOUT PREJUDICE**

Plaintiff Sahar Safakish. individually, by and through undersigned counsel, pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, hereby files this Notice of Voluntary Dismissal *without* Prejudice of the above-styled action. Defendant has not filed an answer or a motion for summary judgment in this proceeding.

1 Dated: October 6, 2025

2 Respectfully Submitted,

3 /s/ Gerald D. Lane, Jr.

4 **GERALD D. LANE, JR., ESQ.**

5 California Bar No.: 352470

6 E-mail: gerald@jibraellaw.com

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10 Phone: (754) 444-7539

11 *Counsel for Plaintiff*

12 **CERTIFICATE OF SERVICE**

13 The undersigned hereby certifies that on October 6, 2025, the foregoing was
14 electronically filed with the Clerk of the Court using the CM/ECF system which will send a
15 notice of electronic filing to all counsel of record.

16 /s/ Gerald D. Lane, Jr.

17 GERALD D. LANE, JR., ESQ.

18 California Bar No.: 352470